

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 20-cr-20-jdp

DANIEL PEGGS,

Defendant.

UNOPPOSED MOTION FOR EXTENSION OF TIME

Daniel Peggs, by counsel, files this motion for a three-week extension of time to file pretrial motions. I would ask that they be due on June 25. I have conferred with AUSA Julie Pfluger and she has no objection to this request.

The defense previously asked for pretrial motions to be due at the end of this week. At the time, my schedule was clear for later part of May and I believed I would have no problem giving this case and the motions the time they demand. Unfortunately, with Mr. Moyers's departure five weeks ago, I inherited eight cases and that has occupied much of my time over the last month. While I have drafted three of the six motions the defense plans to file in Mr. Peggs's case, I cannot finish the other motions this week. I have four sentencings in the next six days and looking ahead there is no time to finish the motions by Friday and avoid presenting a sloppy work product. Thus, I would respectfully request three weeks, until June 25 to file the pretrial motions. Again, I have spoken with AUSA Julie Pfluger and she has no objection to this request.

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

Dated at Madison, Wisconsin, this 1st day of June, 2021.

Respectfully submitted,

Daniel Peggs, Defendant

/s/Joseph A. Bugni
Joseph A. Bugni

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.
22 East Mifflin Street, Suite 1000
Madison, Wisconsin 53703
Tel: 608-260-9900
Fax: 608-260-9901
Joseph_bugni@fd.org

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.